

RECEIVED  
CENTRAL FAX CENTER

OCT 30 2003

OFFICIAL

REMARKS

1. Applicant thanks the Examiner for the Examiner's comments which have greatly  
5 assisted Applicant in responding.

2. 35 U.S.C. §102(b).

The Examiner has rejected Claims 1-46 under 35 U.S.C. §102(b) as being anticipated  
10 by Prezioso (U.S. Patent No. 5,577,169).

Applicant respectfully disagrees.

(a) Claim 1

15

Independent Claim 1 appears below.

1. A computer implemented method of generating an enhanced profile of an  
individual entity, the profile including for each member of the individual entity, a  
20 single observation having at least one variable describing historical transactions  
pertaining to that member, the method comprising:

generating at least one single entity profile of an individual entity having  
individual members, from historical transactions of the members of the individual  
entity;

generating at least one multiple entity profile of at least one multiple entity defined by a combination including individual entities, from historical transactions that include the members of each of the individual entities included in a multiple entity; and

- 5 enhancing at least one single entity profile using at least one multiple entity profile to generate the enhanced profile.

Specifically, the Examiner stated that Prezioso teaches the last two limitations of Claim 1: "generating at least one multiple entity profile of at least one multiple entity defined by  
10 a combination including individual entities, from historical transactions that include the members of each of the individual entities included in a multiple entity" and cited the Background of the reference, and "enhancing at least one single entity profile using at least one multiple entity profile to generate the enhanced profile" and cited columns 7-9.

- 15 Applicant appreciates that the Examiner has cited these sections of the reference. Applicant has carefully read such sections to glean what the Examiner viewed as reading on the claims. However, after a thorough reading of these sections, it still was not clear to Applicant which features of the reference the Examiner views to be that of the claimed invention.

20

Applicant respectfully points out that Rule 1.104(c)(2) states that the pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified. Therefore, Applicant respectfully requests that the Examiner clearly explain why Claim 1 was rejected.

As further support, Applicant refers to the Abstract of the claimed invention for a general sense of the invention. The Abstract is provided herein below, emphasis added:

5        Computer implemented processes and software products generate profiles of  
entitles, such as providers, clients, merchants and customers, and entitles  
comprising interacting pairs of entitles. The processes including deriving direct  
profiles from transaction data pertaining to an entity and enhancing the profile of  
one entity using the profile of another entity. Parallel and serial applications of  
10       the derive and enhance processes on various individual and multiple entities  
yields enhanced profiles that powerfully describe the interactions and  
relationship of the entitles to each other, and between their members.

Applicant respectfully points out that Prezioso (US 5,577,169) does not teach entities  
15       comprising interacting pairs of entities, nor enhancing the profile of one entity using the  
profile of another entity, nor enhance processes, nor multiple entities yielding enhanced  
profiles that powerfully describe the interactions and relationship of the entities to each  
other, and between their members, to which the claimed invention is directed.

20       Specifically, Columns 5-6 do not teach an interaction between profiles, nor then, could  
they teach an entity/profile which is itself the interaction of two separate entities/profiles.

Nowhere does the prior art of record teach members of peer groups interacting with  
other members outside the peer group, and hence, have an entity/profile be comprised

of interacting entities /profiles or multiple entities/profiles. Prezioso's teachings are confined to within a specific peer group.

Nowhere in the examples nor in the disclosure are **interacting entities/profiles** shown,  
5 **nor enhanced profiles and across peer groups**, such as for example, physician AND client as per the claimed invention.

The Examiner will therefore appreciate that Prezioso does not provide entities comprising interacting pairs of entities, enhanced profiles resulting from the process of  
10 enhancing the profile of one entity using the profile of another entity, multiple entities yielding enhanced profiles that powerfully describe the interactions and relationship of the entities to each other, and between their members and their corresponding processes, all to which the claimed invention is directed. Therefore, the reference does not read on the claimed invention.

15

Therefore, Claim 1 and its dependent claims are in allowable condition. Accordingly, Applicant requests that the Examiner withdraw the rejection.

(b) Claims 31-39, 42 and 45

20

As in the argument hereinabove for Claim 1, Applicant is not clear as to what features of the reference are being cited in order to reject each claim. For each of these claims, the Examiner cited entire columns and number of columns, *i.e.* background of the invention, columns 6-7, columns 7-9, columns 7-10, column 8, columns 8-9, and columns 12-13.

Applicant has carefully reviewed each of these sections and has tried to glean from such sections why each claim was rejected. However, especially because Applicant is of the opinion that the reference does not teach all limitations of the invention (see  
5 argument hereinabove), Applicant would greatly appreciate the Examiner citing specifically which features the Examiner believes to make the invention, or, accordingly consider that Claims 31-39, 42, and 45 and their respective dependent claims are in allowable condition.


10 Therefore, Applicant respectfully requests that the Examiner withdraw the rejection.

### CONCLUSION

Based on the foregoing, Applicant considers the present invention to be distinguished  
15 from the art of record. Accordingly, Applicant earnestly solicits the Examiner's withdrawal of the rejections raised in the above referenced Office Action, such that a Notice of Allowance is forwarded to Applicant, and the present application is therefore allowed to issue as a United States patent.

20

Respectfully Submitted,



Michael A. Glenn,

Reg. No. 30,176

25 Customer No. 22862